REMARKS

Applicant hereby responds to the Office Action of October 4, 2007. Applicant thanks the Examiner for carefully considering the application.

Status of Claims

Claims 1-6, 8-15, 17-25, 27 and 28 are pending in the above-referenced patent application. Claims 1, 10, and 20 are independent.

Claims 1-6, 8-15, 17-25, 27 and 28 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application No. 20060200253 ("Hoffberg").

Rejection under 35 U.S.C. 102

Rejection of claims 1-6, 8-15, 17-25, 27 and 28 is respectfully traversed because, for at least the following reasons, Hoffberg does not disclose all of the claimed limitations.

Independent claims 1, 10, and 20 of the present application each require, in part, "accessing the associated device and use the control interface description contained in the selected device to generate a device user interface for user interaction with that selected device." By contrast, Hoffberg fails to disclose at least these claimed limitations.

The instant Office Action asserts that paragraphs 0818-0820 of Hoffberg disclose using the selected link to access the associated device and use "the control interface description contained in the selected device" to generate a device user interface for user interaction with that selected device. Applicant respectfully disagrees. The relevant portions of Hoffberg read:

[0818] As applied to a multimedia database storage and retrieval system, the user

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programs, through an adaptive user interface according to the present invention, **the
processing of data,** by defining a criteria and the actions to be taken based on the
determination of the criteria. The criteria, it is noted, need not be of a predefined type, and in
fact this is a particular feature of the present invention. A pattern recognition subsystem is
employed to determine the existence of selected criteria. ...

[0819] The potential significant hardware requirement for image processing and
pattern recognition is counterbalanced by the enhanced functionality available by virtue of the
technologies. When applied to multimedia devices, the interface system allows the operator to
define complex criteria with respect to image, abstract or linguistic concepts, which would
otherwise be difficult or impossible to formulate. Thus, **the interface system becomes part
of a computational system** that would otherwise be too cumbersome for use. ....

[0820] **A pattern recognition subsystem allows a "description" of an "event"**
without explicit definition of the data representing the "event". Thus, instead of requiring
explicit programming, an operator may merely define parameters of the desired "event". This
type of system is useful, for example, where a user seeks a generic type of data representing a
variety of events. ... (Emphasis added)

From the above passages, it is clear that Hoffberg uses a pattern recognition subsystem to
process the data, and thus extracts the description used for the interface. Indeed, Hoffberg is
silent with respect to the claimed "control interface description," which is "contained in the
selected device." Hoffberg does not teach using "the control interface description contained in
the selected device" to generate the device user interface as claimed.

When asserting that Hoffberg discloses such "control interface description," the instant
Office Action has relied upon paragraph 0971 of Hoffberg. However, paragraph 0971 of
Hoffberg includes a single phrase: VCR Interface. Thus, whether Hoffberg teaches a "control
interface description," and where the purported "control interface description" is contained, have

to be inferred from elsewhere in Hoffberg. For example, paragraph 0983 of Hoffberg reads:

[0983] ... an intelligent **interface which stores data** concerning programming, user preferences, **and by means of some logical method, such as Boolean logic, fuzzy logic, neural network theory, or any other system which may be used to generate a prediction,** to determine if an entry is likely in error, by comparing the prediction with the entry. Of course, these predictive systems would also provide an initial default entry, so that an a priori most probably action or actions may be initially presented to the user. (Emphasis added).

Further, paragraph [0815] of Hoffberg reads:

[0815] The interface system according to the present invention is not limited to a single data source, and may analyze data from many different sources for its operation. **This data may be stored data or present in a data stream.** Thus, in a multimedia system, there may be a real-time data stream, a stored event database, as well as an exemplar or model database. ... (Emphasis added).

From the above passages [0983] and [0815], it is clear that Hoffberg's interface obtains and stores information, and further analyzes the data in an intelligent way to extract information used for the interface. Thus, Hoffberg does not teach a "control interface description" that is "contained in the selected" device as claimed.

Even if the interface as taught by Hoffberg generates the interface based on some information that would be equivalent to the claimed "control interface description" (which Applicant respectfully traverses), such purported "control interface description" would have to be intelligently extracted from many different sources, such as user preferences obtained from user feedback, and then stored at a central location to be accessed. By contrast, the claimed system

and method advantageously provide direct access to the control interface description "contained" in the devices, based on which the claimed "device user interface" can be quickly and easily generated.

In view of the above, Hoffberg fails to disclose all of the claimed limitations of independent claims 1, 10, and 20 of the present application. Thus, independent claims 1, 10, and 20 of the present application are patentable over Hoffberg for at least the reasons set forth above. Dependent claims are allowable for at least the same reasons.

Regarding dependent claims 2, 11 and 21, Applicant further respectfully submits that Hoffberg fails to disclose the additional limitations of "a pointer from the top page user interface description to at least the device information in an associated device." As discussed above, Hoffberg teaches an intelligent interface that does complex data processing and analysis to generate the interface by extracting data from many different sources and storing the extracted data at a central location, and such interface does not provide a direct "pointer" to at least the "device information in an associated device" as does the claimed invention.

In making the rejection, the instant Office Action has relied upon paragraph 0830 of Hoffberg. However, paragraph 0830 of Hoffberg merely mentions learning and adaptive interface that detects events and makes decisions based on known or predetermined characteristics. The remainder of Hoffberg does use the phrase "pointer," but in a completely different context. That is, the pointer (e.g., finger) of Hoffberg refers to a position as detected by a position sensor (see, e.g., paragraph 0012). Thus, dependent claims 2, 11 and 21 are allowable for at least these additional reasons.

Regarding dependent claims 6, 15 and 25, Applicant further respectfully submits that,

contrary to the assertions made in the instant Office Action, Hoffberg does not teach the additional limitations that "the device information in each device includes device identification information for that device." The instant Office Action has relied upon paragraph 0831 of Hoffberg to make the rejection. However, paragraph 0831 of Hoffberg merely discusses intelligent program recognition and characterization system for identifying channel and time of programs, not the "device identification information" as claimed. Thus, dependent claims 6, 15 and 25 are allowable for at least these additional reasons.

Regarding dependent claims 8, 17 and 27, Applicant further respectfully submits that, contrary to the assertions made in the instant Office Action, Hoffberg does not teach the additional limitations that "each link in the top page user interface description provides direct access to at least the user control interface description in each associated device." The instant Office Action has relied upon paragraph 0815 of Hoffberg to make the rejection. However, as discussed above, paragraph 0815 of Hoffberg teaches data stored in a central database, or as a part of a data stream, but does not teach that the data is stored in the individual device and is directly accessed. Thus, dependent claims 8, 17 and 27 are allowable for at least these additional reasons.

Regarding dependent claims 9, 18 and 28, Applicant further respectfully submits that, contrary to the assertions made in the instant Office Action, Hoffberg does not teach the additional limitations that "the top page user interface description further includes device data corresponding to each device." The instant Office Action has relied upon paragraph 0836 of Hoffberg to make the rejection. However, paragraph 0836 of Hoffberg discusses making use of unused available spectrum bandwidth within the NTSC channel space, or other broadcast system channel space, and is not relevant to the "device data corresponding to each device" as claimed. Thus, dependent claims 9, 18 and 28 are allowable for at least these additional reasons.

Regarding claim 19, the instant Office Action refers to paragraphs 0801-0802 of Hoffberg and asserts that Hoffberg discloses the additional limitations of "using each link in the top page user interface description to access the device information in each corresponding device." Applicant respectfully disagrees. Indeed, paragraphs 0801-0802 of Hoffberg are not relevant to the claimed limitations and read:

> [0801] The present invention provides, according to one embodiment, an adaptive user interface which changes in response to the context, past history and status of the system. The strategy employed preferably seeks to minimize, for an individual user at any given time, the search and acquisition time for the entry of data through the interface.

> [0802] The interface may therefore provide a model of the user, which is employed in a predictive algorithm. The model parameters may be static (once created) or dynamic, and may be adaptive to the user or alterations in the use pattern.

The above passages of Hoffberg discusses predictive model for an interface, but is silent with respect to "using each link in the top page user interface description to access the device information in each corresponding device" as claimed.
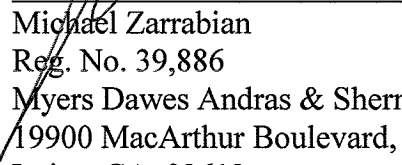
In view of the above, withdrawal of the rejections of all pending claims is respectfully requested.

CONCLUSION

In view of the foregoing, it is respectfully submitted that all of the claims are allowable. Applicant hereby reserves the right to present further arguments and/or amendments in support of allowance of the claims. If it is believed that a telephone interview will help further the prosecution of this case, Applicants respectfully request that the undersigned attorney be contacted at the listed telephone number.

Please direct all correspondence to **Myers Dawes Andras & Sherman LLP**, 19900 MacArthur Blvd., 11th Floor, Irvine, California 92612.

Respectfully submitted,

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Michael Zarrabian   (Date)
Reg. No. 39,886
Myers Dawes Andras & Sherman, LLP
19900 MacArthur Boulevard, 11th Floor
Irvine, CA 92612
Tel: (949) 223-9600
Fax: (949) 223-9610
Customer No.: 23386

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